

CHARLES LABELLA  
Deputy Chief  
THOMAS B. W. HALL  
ALISON ANDERSON  
Trial Attorneys  
Fraud Section, Criminal Division  
U.S. Department of Justice  
1400 New York Avenue, NW  
Washington, DC 20530  
(202) 616-1682

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

-oOo-

UNITED STATES OF AMERICA,	)	
	)	CASE NO. 2:13-cr-00018-JCM-GWF
	)	
Plaintiff,	)	
	)	
v.	)	<b>STIPULATION TO CONTINUE PRE-</b>
	)	<b>SENTENCE REPORT INITIAL DUE</b>
CHARLES MCCHESENEY,	)	<b>DATE</b>
	)	
Defendant.	)	

IT IS HEREBY STIPULATED AND AGREED by and between THOMAS B.W. HALL, and DOUGLASS MITCHELL, ESQ., counsel for defendant Charles McChesney, that the Probation Office's Pre-Sentence Report ("PSR") initial deadline (currently June 15, 2015) be extended one week to June 22, 2015.

This Stipulation is entered into for the following reasons:

1. On January 27, 2015, Defendant Charles McChesney entered a plea of guilty to the wire fraud and conspiracy to commit wire and mail fraud charges against him.
2. Defendant McChesney's sentencing is set for July 20, 2015, and his initial PSR is due to counsel for the Government and defense counsel on June 15, 2015.

3. On June 15, 2015, the Court will hold an evidentiary hearing regarding loss in this matter, and on June 17, 2015, the Court will sentence defendants Keith Gregory, Salvatore Ruvolo, David Ball, and Edith Gillespie.

4. The evidentiary hearing and the sentencing will provide clarity to the Government and to defense counsel regarding the Court's approach to loss and restitution issues, and therefore inform the approach to be taken with the PSR.

5. Counsel for the United States has spoken to Ms. Sandi Schmidt of the Probation Office, and she requested that the parties enter into this stipulation.

DATED this 12th day of June, 2015.


Respectfully submitted,

/s/ Thomas B.W. Hall  
THOMAS B.W. HALL  
Trial Attorney

/s/ Douglass Mitchell  
DOUGLASS MITCHELL  
Counsel for Defendant Charles McChesney

DATED June 15, 2015.

IT IS SO ORDERED.

  
\_\_\_\_\_  
HON. JAMES C. MAHAN  
UNITED STATES DISTRICT JUDGE

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

-oOo-

UNITED STATES OF AMERICA,	)	
	)	CASE NO. 2:13-cr-00018-JCM-GWF
	)	
Plaintiff,	)	
	)	
v.	)	<b>CERTIFICATE OF SERVICE</b>
	)	
CHARLES MCCHESENEY,	)	
	)	
Defendant.	)	

I, the undersigned, hereby certify that this pleading was filed with the clerk of court via ECF and will be served electronically via ECF on all parties that have entered their appearances in this case.

Dated: June 12, 2015

Respectfully submitted,

/s/ Thomas B.W. Hall  
THOMAS B.W. HALL  
Trial Attorney  
United States Department of Justice  
Criminal Division, Fraud Section